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Mr. Chein Kao
Department of Toxic Substances Control
700 Heinz Avenue., Suite 200
Berkeley, CA 94710

Subj: CHRONOLOGY OF ACTIVITIES RELATED TO PHASES 1 & 2A DATA
VALIDATION, NAVAL AIR STATION, ALAMEDA, CA

Dear Mr. Kao:

Enclosure (1) is provided as requested by your office during the meeting between the DTSC and the Navy on November 24, 1992.

If you have any questions regarding this matter, please contact either Mr. Gary Munekawa, Code 1811GM, (415) 244-2524, or Mr. George Kikugawa, Code 1811GK, (415) 244-2559.

Sincerely,
original signed by:

LOUISE T. LEW
By direction .

Encl: (1) Chronology of Activities related to Phases 1 and 2A Data Validation.

Copy to (w/enclosure):
California Regional Water Quality Control Board (Attn: James Nusrala)
NAS Alameda (Attn: Lt. Mike Petouhoff)
PRC Environmental Management Inc. (Attn: Duane Balch)
James M. Montgomery Consulting Engineers (Attn: Ken Leung)

Blind copy to:
1811, 1811GM, 1811GK
Admin. Record (3 copies)
Chron, Blue, Pink, Green
File: NAS, Alameda

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Chronology of Activities related to Phases 1 and 2A Data Validation

November 21, 1991 -the Navy issued scope of work (SOW) for to its CLEAN contractor, PRC Environmental Management, Inc. (PRC). Included in the SOW was a task to "Review Data and Prepare Phases 1 and 2A Data Summary Report"

January 8, 1992 -As outlined in the post-negotiation work plan, part of the task included "obtaining, summarizing, interpreting, reformatting (when necessary), and discussing data generated by Canonic for Phases 1 and 2A." A portion of this activity included "review and QC [quality control] chemical analytical data."

A fundamental assumption, necessary for completion of the review and QC of Canonic's chemical analytical data was that the necessary information and documentation would be available.

The Navy and the PRC team (including CLEAN team firm James M. Montgomery, Consulting Engineers, Inc. [JMM]) reviewed the preliminary Canonic data that had been previously forwarded to the Navy for the Phases 1 and 2A investigation in January 1992, and found that these analytical results data did not include the laboratory support information necessary to perform data validation equivalent to that being performed on data collected by the PRC team as part of the Phases 2B and 3, and Phases 5 and 6 field investigations.

Though data validation appears to have not been required for the Phases 1 and 2A chemical analytical data (as documented in Navy's recent letter to Mr. Tom Lanphar in your office, dated January 8, 1993), the Navy determined, for comparative purposes and consistency with the other ongoing field investigations at NAS Alameda, that the Navy's CLEAN contractor should similarly validate all Phases 1 and 2A analytical data. Thus, finding that the support data for such validation was not yet in Navy hands, the Navy directed the PRC team to contact Canonic and retrieve the necessary analytical support documentation.

January 23, 1992 -The PRC team notified the Navy in a letter, that the Canonic electronic data base was incomplete, and that if the hard copy data had to be hand-entered (over 1000 data points entered or checked) then substantial additional time and effort would be required towards completion of the Phases 1 and 2A data summary report.

January 31, 1992 -Navy Engineer-in-Charge Mr. Wing Wong, wrote to Canonic requesting additional information towards completion of the analytical data base forwarded to JMM in September 1991, as portions of the previously received Phases 1 and 2A hard copy analytical data tables could not be found in the electronic database, and the data base included results not found in the hard copy information.

February 19, 1992 -At a meeting between PRC and JMM, JMM indicates that up to 40 percent of the electronic data base is missing.

April 24, 1992 -In a letter to the Navy, Canonie's Mr. Jim Babcock indicates that they are "continuing to respond to your letter requesting information and additions to the NAS Alameda database." Based on this letter, the Navy assumed the validation data would be available and forthcoming.

June 2, 1992 -Meeting at the DTSC office in Berkeley. The Navy and the PRC team presented to the DTSC and RWQCB potential approaches to additional future work at NAS Alameda. As part of the discussion of the impact to the RI/FS schedule, the Navy discussed the difficulty it was having in getting the laboratory support data required to fully validate the Phases 1 and 2A analyses. The DTSC did not wish to see the deliverable date for the Phases 1 and 2A report slip past December 1992. The DTSC suggested that the Navy send the DTSC advance, but unvalidated, copies of the Phases 1 and 2A data for their own review. The Navy indicated that they would give Canonie until the end of June 1992, to produce the required data, and would discuss with the PRC team the possibility of releasing Phases 1 and 2A data analysis to the DTSC before the draft report was generated.

July 28, 1992 -As reported to the DTSC in the Installation Restoration Program (IRP) Monthly Status Report (MSR) for June 1992, Navy's CLEAN contractor received from Canonie a portion of the laboratory support data (a portion of the missing electronic data base requested in January 1992), and the PRC team began cross-checking the data with the hard-copy materials in anticipation of validating the Phases 1 and 2A data.

August 19, 1992 -At a meeting with the DTSC, the Navy was requested to submit a site by site summary of the analytical results (with no qualifiers) from the Phases 1 and 2A sampling effort prior to the submittal of the draft data summary report, in order to reduce DTSC review time.

August 25, 1992 -As reported to the DTSC in the IRP MSR for July 1992, the remainder of Canonie's electronic data base was received on July 21, 1992, and evaluation of the data continued.

August 27, 1992 -TRC meeting held at the DTSC office in Berkeley. Navy indicated that work was continuing on quality control (QC) review and validation of the Phases 1 and 2A analytical data.

September 16, 1992 -As reported to the DTSC in the IRP MSR for August 1992, very little QC data were found in the data base received from Canonie in July 1992. It was stated that the data set may be subject to significant limitations due to the incompleteness of the QC data.

October 2, 1992 -Navy submitted to DTSC the "Hits Only" analytical tables for the Canonie Phases 1 and 2A sites at NAS Alameda. It was noted that these data had not yet gone through the QC and validation process.

October 19, 1992 -The PRC team drafted a letter to the Navy suggesting possible courses of action related to (1) retrieving the missing data from Canonie, (2) possibly resampling the missing data points, and (3) concerning generation of the draft DSR for DTSC review without validated data. It was assumed that in order to meet the DTSC delivery date of December 7, 1992, the draft DSR would need to be generated without validated data. It was agreed that the DTSC be contacted to discuss this issue as well as the useability of the non-validated data for future risk assessment work and for assessing the data gaps at the Phases 1 and 2A sites.

November 18, 1992 -As reported to the DTSC in the October 1992 IRP MSR, while work had continued in October 1992 on attempting to validate the Phases 1 and 2A data, it was suggested that a meeting be held to discuss the lack of QC data with which to qualify the analytical data.

November 19, 1992 -The Navy and the PRC team held a conference call to discuss the format of the upcoming draft data summary report with Ms. Virginia Lasky and Mr. Tom Lanphar, both of the DTSC, to discuss that the report would revolve around the data as reported, but not validated. It was tentatively agreed at that time that the DTSC would receive and review the draft DSR, and then would meet with the Navy on December 16, 1992, to discuss the suitability of the data for risk assessment and for identifying data gaps at the Phases 1 and 2A sites.

November 20, 1992 -The DTSC requested an earlier meeting to discuss the data validation issue before the draft DSR is generated for DTSC review.

November 24, 1992 -Navy and its CLEAN contractor met with the DTSC to discuss the Phases 1 and 2A data summary report.

December 1, 1992 -A conference call between the Navy, the PRC team and the DTSC was held to discuss the sites investigated under Phases 1 and 2A.

December 2, 1992 -At the TRC meeting at the DTSC, the draft Phases 1 and 2A data summary report was distributed to the Navy and the DTSC. The data quality issue was briefly discussed before the TRC.

December 4, 1992 -The Navy, PRC team, and Canonie met at a laboratory file storage site (Weston Labs in Stockton) to assess what data and associated QC data were available and to discuss QC data package practices.

December 10, 1992 -The Navy and PRC team met to discuss the Canonie data and the Phases 1 and 2A data summary report. Minutes of this meeting were sent to the DTSC on January 6, 1993.